

Patrick A. Swindell (SBN 19587450)  
SWINDELL LAW FIRM  
106 SW 7th Ave.  
Amarillo, TX 79101  
(806) 374-7979  
(806) 374-1991 FAX  
E-mail: pat@swindellandassociates.com

**PROPOSED ATTORNEYS FOR KRISU HOSPITALITY, LLC  
DEBTOR AND DEBTOR IN POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

IN RE:	§	
	§	Case No. 19-20347
KRISU HOSPITALITY, LLC ,	§	(Chapter 11)
	§	
Debtor.	§	
	§	

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**MOTION OF DEBTOR TO EXTEND TIME FOR FILING CERTAIN LISTS,  
SCHEDULES, AND STATEMENTS PURSUANT TO BANKRUPTCY  
RULE 1007**

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**TO THE HONORABLE ROBERT L. JONES, U.S. BANKRUPTCY JUDGE:**

Krisu Hospitality, LLC debtor and debtor in possession (“Krisu” or the “Debtor”) file this  
*Motion of Debtor to Extend Time for Filing Certain Lists, Schedules, and  
Statements Pursuant to Bankruptcy Rule 1007* (the “Motion to Extend Time  
(Schedules)”) and in support thereof would show the Court the following.

**INTRODUCTION**

1. This motion seeks authorization for the Debtor to file schedules, equity security holders list, and the SOFA on or before December 4, 2019. As of the filing of this motion, the date and time of the Code §341 meeting of creditors is not yet set.

### **JURISDICTION AND VENUE**

2. The Court has jurisdiction over this action pursuant to, and without limitation §§ 105, 363, 507, and 1101 et seq. of the United States Bankruptcy Code, 11 U.S.C. § 101 et seq. (the “Code”).

3. Venue action is proper in this Court pursuant to 28 U.S.C. § 1409.

4. The Court may try this action to a conclusion and enter final orders under *Stern v. Marshall*, 131 S. Ct. 2594 (U.S. 2011).<sup>2</sup>

### **FACTUAL BACKGROUND**

#### **The identify and background of the Debtors and Debtors in Possession.**

5. Krisu constructed, and owns and operates the LaQuinta Inn & Suites hotel in Pampa, Texas.

#### **The Commencement of the Bankruptcy Case.**

6. On November 5, 2019, Krisu commenced the above-captioned Chapter 11 case by filing a voluntary petition.

7. The factors leading to the commencement of this case include the (1) lingering effects of replacement of the original general contractor and delayed opening of the hotel, (2) changes in the Choice-Wyndham reservations and payment system which interrupted receipts on corporate accounts, and (3) difficult economic conditions in the rural Texas Panhandle resulting from fluctuations in the energy industry.

#### **Factual background in support of the relief requested, and basis of relief.**

8. Krisu has filed its list of the twenty largest unsecured creditors.

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<sup>2</sup> Since the initial filing of this case, the Debtor has determined that it is no a small business under Code § 101(51C).

9. Debtor seeks an extension of time to file its schedules and other initial pleadings to December 4, 2019.

10. Bankruptcy Rules 1007(a)(5) and (c) authorizes the Court to grant an extension of the date by which the lists and the schedules and statements of the Debtor must be filed pursuant to Bankruptcy Rule 1007, "on motion for cause shown."

11. Cause exists for an extension due to the suddenness with which the Debtor was forced to commence this case and the lack of preparation prior to such case.

12. The undersigned counsel commenced his representation of Krisu on November 2, 2019 after prior counsel who was planning to commence this case withdrew upon the discovery of a conflict of interest.

13. Notice of this Motion has been provided to the Office of the United States Trustee for the Northern District of Texas, and all registered ECF users who have appeared in this case to date.

### **RELIEF REQUESTED**

14. Accordingly, pursuant to Rule 1007, Krisu respectfully requests an extension through and until December 4, 2019 the time to permitted to file its schedules, list of equity security holders, and statement of financial affairs, and any other items required by Rule 1007.

### **CONCLUSION AND PRAYER**

WHEREFORE, Krisu Hospitality, LLC, the debtor and debtor-in-possession respectfully request that the Court enter an order (i) extending through and until December 4, 2019 the time permitted to file its schedules, list of equity security holders, and statement of financial affairs, and any other items required by Rule 1007; and (ii) granting such other and further relief to which the Debtor may be entitled at law or in equity.

Dated: November 6, 2019

Respectfully submitted:

**SWINDELL LAW FIRM**

By: /s/ Patrick A. Swindell  
Patrick A. Swindell  
State Bar No. 19587450  
106 SW 7th Ave.  
Amarillo, TX 79101  
(806) 374-7979  
(806) 374-1991 FAX  
E-mail: pat@swindellandassociates.com

PROPOSED ATTORNEYS FOR KRISU  
HOSPITALITY, LLC , DEBTOR AND DEBTOR IN  
POSSESSION

**CERTIFICATE OF CONFERENCE**

/s/ Patrick A. Swindell  
Patrick A. Swindell

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing item on November 5, 2019 was served upon (i) all registered ECF users who have appeared in this case to date (including the United States Trustee) and (ii) the twenty largest unsecured creditors.

/s/ Patrick A. Swindell  
Patrick A. Swindell

**PROPOSED ORDER**